

STATE OF TENNESSEE
18th JUDICIAL DISTRICT

Circuit Court Sumner County, Tennessee



COPY

☒ Original
☐ Alias
☐ PluriesShawn Nance

Plaintiff(s)

vs. Case # 83CC1-2018-CV-537G4 Secure Solutions (USA) Inc.

Defendant(s)

☐ Local Sheriff,
☐ Out of County
☐ Sec. of State
☐ Comm. of Ins.
☒ Attorney
☒ Certified MailTO THE ABOVE NAMED DEFENDANT(S): G4 secure solutions (USA) Inc.

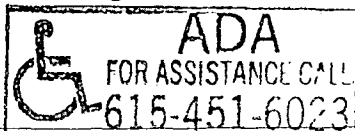
You are hereby summoned to appear and defend a Civil Action filed against you in the Circuit Court, Sumner County, Tennessee; and your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. You are further directed to file your defense with the Clerk of this Court and send a copy to the Plaintiff's Attorney, Roland Munford
242 West Main St No. 223 whose address is
Hendersonville TN 37075. In case of your failure to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

TO THE SHERIFF: Execute this summons and make your return herein as provided by law.

WITNESS, Kathryn Strong, Clerk of the Circuit Court at Office in Gallatin, Tennessee, the

Issued June 6, 20 18

KATHRYN STRONG, CLERK

By: Sheffield D.C.

RECEIVED THIS SUMMONS FOR SERVICE, THIS ____ DAY OF _____, 20 ____

Deputy Sheriff

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the ____ day of _____, 20 ____, I served this summons together with a copy of the complaint herein as follows:

SHERIFF - DEPUTY SHERIFF

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the _____ day of _____, 20 ____, I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in Case No. _____ to the defendant, _____.

On the _____ day of _____, 20 ____, I received the return receipt for said registered or certified mail, which had been signed by _____ on the _____ day of _____, 20 _____. Said return receipt is attached to this original summons and both documents are being sent herewith to the Circuit Court Clerk for filing.

SWORN TO AND SUBSCRIBED BEFORE ME ON
THIS _____ DAY OF _____, 20 ____

PLAINTIFF/PLAINTIFF'S ATTORNEY OTHER
PERSON AUTHORIZED BY STATUTE TO SERVE
PROCESS

_____, NOTARY PUBLIC or _____, DEPUTY CLERK
My Commission Expires: _____

NOTICE

TO THE DEFENDANT(S):

Tennessee law provides a ten thousand dollar (\$10,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)

STATE OF TENNESSEE

I, Kathryn Strong, Clerk of the Circuit Court in the State and County aforesaid, do hereby certify this to be a true and correct copy of the original summons issued in this case.

COUNTY OF SUMNER

(To be completed only if
copy certification required.)

Kathryn Strong, Clerk

COPY

IN THE CIRCUIT COURT FOR SUMNER COUNTY, TENNESSEE
AT GALLATIN

SHAWN NANCE

PLAINTIFF,

vs.

G4S SECURE SOLUTIONS (USA) INC.

DEFENDANTS

Docket: 83CC1-2018-d-557

JURY DEMAND (12)

FILED

2:21 PM

JUN 06 2018

KATHRYN STRONG, CLERK
BY D.C.

COMPLAINT

COMES NOW the Plaintiff, SHAWN NANCE, by and through counsel, and brings this cause of action against the Defendant **G4S SECURE SOLUTIONS (USA) INC.** Plaintiff would respectfully show the Court as follows:

1. The Plaintiff, Shawn Nance, hereafter referred to as Plaintiff, is a citizen and resident of Macon County, Tennessee, residing at 813 Brattontown Circle, Lafayette, Tennessee, 37083. Plaintiff brings this lawsuit for money damages due to damages he sustained arising out of a retaliatory discharge and/or termination of employment. At all times pertinent hereto, Plaintiff was an employee of Defendant G4S Secure Solutions (USA) Inc. as defined and within the meaning of T.C.A. 50-1-304(a)(1).

2. Defendant G4S Secure Solutions (USA) Inc. (Defendant G4S), is upon information and belief, a corporation organized under the laws of Tennessee and/or Florida, with its principal place of business at 1395 University Blvd, Jupiter, Florida, 33458.

3. Defendant G4S may be served process through its registered agent Corporation Service Company, 2908 Poston Avenue, Nashville, Tennessee, 37203.

4. All acts complained herein occurred in Sumner County, Tennessee and venue is proper in this Court.

5. Defendant G4S is vicariously liable for the retaliation as defined in the Tennessee Public Protection Act TCA 50-1-304 perpetrated by Kendall Jones, Olivia Kritch, Jon Knowles, and other employees pursuant to TCA 50-1-304(d)(1).

6. On the basis of the forgoing, Defendant share fully in the liability resulting from the negligent acts and/or omissions of their employees, agents, and/or servants under the theories of respondeat superior and/or agency.

FACTS

7. Plaintiff was hired by Defendants on or about February 3, 2018 as a Custom Protection Officer for healthcare facilities.

8. Plaintiff was hired as a full time employee working forty or more hours per week earning \$8.75 per hour for training and subsequently \$16.00 per hour upon completing training on or about April 8, 2018. Plaintiff qualified for overtime and in fact performed his duties earning overtime pay.

9. Chris Clark was the manager over security officers at Hendersonville Medical Center and Portland Tri Star Emergency Room. John Faust was the on-site operations manager at Portland Tri Star Emergency Room providing direct supervision over Plaintiff.

10. On or about April 18, 2018, Plaintiff reported and disclosed illegal activity in the form of wage theft perpetrated by Matthew Wilson to Chris Clark and John Faust. Plaintiff observed Matthew Wilson falsifying time cards as he was not present on the premises for time claimed otherwise. Plaintiff referred to time cards and video surveillance supporting these allegations. See exhibit A time cards and video surveillance footage. Plaintiff further relied

upon attestations of hospital employees that could not locate Matthew Wilson who required his assistance with mental health patients.

11. On or about April 25, 2018, Plaintiff reported and disclosed illegal activity of additional acts of falsifying time cards as a form of wage theft and in the form of parking violations perpetrated by Matthew Wilson to Chris Clark and John Faust. Between April 26, 2018 and April 28, 2018, Matthew Wilson continued to falsify his time cards and to park his vehicle in front of the emergency room entrance prohibiting immediate patient access and parking. On April 29, 2018, Plaintiff further reported this illegal activity to Chris Clark and John Faust in writing by completing a general incident report. See attached exhibit B general incident report.

12. On or about May 2, 2018, Plaintiff reported and disclosed to HCA Chief Operating Officer Nick Howald (for two hospital campuses referenced above) continuing illegal activity in the form of additional falsifying time cards in the form of wage theft and in the form of parking violations perpetrated by Matthew Wilson through May 2, 2018. Matthew Wilson continued to not be at his assigned post and presumably off the premises. This was also reported and disclosed to HCA Chief Ethics Officer Mark Bolen and Portland Tri Star Emergency Room facility campus director Melanie Scott.

13. On or about April 22, 2018, Plaintiff disclosed numerous issues with technical malfunctions of radio and camera equipment that pertain to a public policy interest of patient safety. Plaintiff further disclosed and reported two vials of injectable medicine with a used needle and scalpel and what appeared to be blood on the floor. This disclosure was in writing on a general incident report form and provided to Chris Clark and filed with all other reports referenced. Plaintiff further notified the EVS technician whose first name is Michael who

subsequently filed a surreptitious ethics complaint against Plaintiff. See attached exhibit C general incident report form and exhibit D photograph.

14. Plaintiff submitted numerous other general incident reports pertaining to these issues that were not resolved as well as other general matters relating to exposed wiring, secured access doors (known as badge access only doors) not operating, and maintenance issues that pertained to a general public policy of patient safety.

15. Plaintiff's schedule was changed to night shift and Matthew Wilson was changed to day shift schedule. Plaintiff was hired with full knowledge by Defendant that he was attending school in the evenings and could only be available during the day shift.

16. Plaintiff has been subjected to false complaints by Matthew Wilson who has expressed defamatory communications about Plaintiff to HCA staff. Upon information and belief, Matthew Wilson and other Defendant employees have recruited HCA employees to file false ethics complaints as a pretext to a showing of good cause for Plaintiff's termination.

17. On April 27, 2018 at 8:14 p.m., Chris Clark sent out a group text message to officers under his supervision stating "like I said someone made a big deal about it and now Bill is afraid of a law suit and I'm sure you all know what kind. Yet one person ruined it for everyone." This is was in reference to Plaintiff's complaint about retaliation against him referenced in paragraph 16 above. Refer to attached Exhibit E Text Messages.

18. On May 17, 2018, Plaintiff was placed on administrative leave without good cause and constituting an additional act charged with hostility and retaliation for reporting illegal activity. Furthermore, Defendant has engaged in further retaliation by seeking out complaints from HCA employees to be filed against Plaintiff to further generate a pretext of good cause for his termination. These complaints were only filed upon Defendant's solicitation after Plaintiff's

reports of illegal activity and in many cases several weeks after the fact where such employees found no cause to file such complaints.

19. On or about June 5, 2018, Plaintiff was terminated without good cause and constituting an additional act charged with hostility and retaliation for reporting illegal activity.

ARGUMENT

20. Plaintiff incorporates paragraphs 1 through 19 as if set out herein.

21. Plaintiff avers an exclusive causal relationship between his refusal to participate in and/or remain silent about illegal activities and his termination by Defendant. More specifically, Plaintiff avers that employees of Defendant as set out above perpetrated these illegal activities and he reported the same to human resources, compliance officers, and/or management. Plaintiff further reported it to executives with HCA.

22. The disclosure of wage theft, parking violations, patient safety hazards by Plaintiff constitute a “refusal to remain silent about illegal activities” pursuant to T.C.A. 50-1-304(b). More specifically, subsumed within Plaintiff’s disclosures were violations of the following “laws” and/or “regulations” per T.C.A. 50-1-304(a)(3):

a. violations of Occupational Safety and Health Act of 1972 T.C.A. 50-3-101 et seq and/or rules and regulations of federal department of Occupational Safety and Health Administration (OSHA);

b. violations of the criminal code of the state of Tennessee Title 39 et seq. and/or more specifically Tennessee law on falsifying time sheets and/or wage theft;

c. violations of Tennessee Title 68 (including but not limited to TCA 68-11-239 and/or 272), Tennessee Department of Health Board for Licensing Healthcare Facilities Chapter

1200-08-01 et seq. and/or more specifically Chapter 1200-08-01-06 Basic Hospital Functions and Chapter 1200-08-01-07 Optional Hospital Services (1) Surgical Services;

d. violations of all public policies and/or Tennessee regulations pertaining to written policies and procedures for the daily operation of secure access entryways;

e. Rules and regulations of the Tennessee Department of Health;

f. all other applicable rules and/or regulations of the Tennessee Department of Environment and Conservation, Tennessee Department of Finance and Administration, Bureau or Board of Health Licensure and Regulation and/or Health Division of Healthcare and/or Facilities, and/or Rules of the Tennessee Board of Medical Examiners;

g. all regulations, policies, guidances, and/or best practices adopted by International Association of Healthcare Central Service Material Management "IAHCSMM" and incorporated in Tennessee code and/or regulations;

h. all federal law, regulations, and/or public policies pertaining to patient safety and public welfare and/or more particularly to central sterile processing services of surgical and/or medical equipment or supplies in hospitals.

23. The termination of Plaintiff constitutes retaliation as defined and/or within the meaning of TCA 50-1-304.

24. As a proximate result of the Defendants' adverse employment action and/or wrongful termination of Plaintiff, Plaintiff has suffered the following damages:

- a. loss of past, present, and future wages and the loss of certain benefits of employment, back pay, interest on back pay, front pay;
- b. pecuniary losses;
- c. emotional pain;

- d. pain and suffering;
- e. inconvenience;
- f. mental anguish;
- g. loss of enjoyment of life;
- h. and non-pecuniary losses.

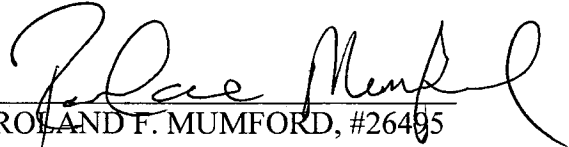
25. Plaintiff further avers that she is entitled to all other damages permitted by law.

WHEREFORE, PLAINTIFF PRAYS FOR RELIEF AS FOLLOWS:

1. For proper process to issue and for the Defendant to be served with a true and accurate copy of this Complaint and that it be required to answer same within the time prescribed law;
2. For a jury to try this cause;
3. For a monetary judgment in favor of the Plaintiff and against the Defendant;
4. For all compensatory damages which are determined to be fair and reasonable and in the amount of three hundred thousand dollars (\$300,000.00);
5. For such other damages including but not limited to back pay, interest on back pay, front pay, which are determined to be fair and reasonable in the amount of five hundred thousand dollars and zero cents (\$500,000.00);
6. For all costs, including discretionary and court costs;
7. For attorney fees.
8. For all other general and/or specific relief as this Honorable Court deems necessary.

Respectfully submitted this the 6th day of June 2018.

BY:


ROLAND F. MUMFORD, #26495

Attorney for Plaintiff

242 West Main Street, No. 223

Hendersonville, TN 37075


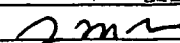
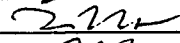
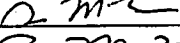
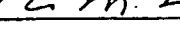
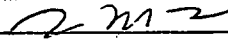
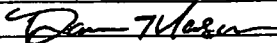



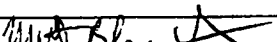
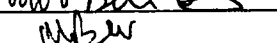
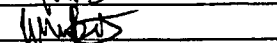





Telephone: 615.348.0070

Facsimile: 615.246.4110


EXHIBIT A

A

MON-SUN

Client: TRISTAR				Post: PORTLAND ER	
From: 4-29-18				To:	
Employee Name: Shawn Nance				SS#: 1027	
Day	Date	Time In	Time Out	Signature	
Monday	4/29	0600	1800		
Monday	4/30	0600	1800		
Tuesday	5/1	0600	1800		
Wednesday	5/2	0600	1700		
Thursday	5/3				
Friday	5/4				
Saturday	5/5				
Sunday	5/6	0600	1800		
Employee Name: Daniel Mason				SS#: 9961	
Day	Date	Time In	Time Out	Signature	
Monday	4/30/2018	1800	0600		
Monday					
Tuesday	5/1/2018	1800	0600		
Wednesday	5/2/2018	1800	2400		
Thursday					
Friday					
Saturday					
Sunday	4/29/18	1800	0600		
Employee Name: Matthew Bahrmann-Wilson				SS#: 6703	
Day	Date	Time In	Time Out	Signature	
Monday					
Monday					
Tuesday					
Wednesday	05-02-18	1700	1800		
Thursday	05-03-2018	0600	1800		
Friday	05-04-2018	0600	1800		
Saturday	05-05-2018	0600	1800		
Sunday					
Employee Name: GRAVE LARRY F				SS#: 2336	
Day	Date	Time In	Time Out	Signature	
Monday					
Monday					
Tuesday					
Wednesday	5-2-18	2400	0600		
Thursday	5-3-18	1800	0600		
Friday	5-4-18	1800	0600		
Saturday	5-5-18	1800	0600		
Sunday					

The actual shift starting time, unless you are late in assuming duties or were specifically requested by the Supervisor to start earlier, in which case the late starting time or requested earlier starting time will be shown. The "Time-Out" column will show the scheduled shift ending time, unless permission is received from the Supervisor to leave earlier, or requested by the Supervisor to work later. Actual ending time will be shown also when relieved late by your replacement or when overtime is necessary for emergency reasons and prior authority could

Client: <u>PMC</u>				Post: <u>Portland Medical Center</u>	
From:				To:	
Employee Name: <u>Matthew Bahman-Wilson</u>				SS#: _____	
Day	Date	Time In	Time Out	Signature	
Monday					
Monday					
Tuesday					
Wednesday	<u>04-25-2018</u>	<u>1200</u>	<u>1800</u>	<u>Matthew Bahman-Wilson</u>	
Thursday	<u>04-26-2018</u>	<u>0600</u>	<u>1800</u>	<u>Matthew Bahman-Wilson</u>	
Friday	<u>04-27-2018</u>	<u>0600</u>	<u>1800</u>	<u>Matthew Bahman-Wilson</u>	
Saturday	<u>04-28-2018</u>	<u>0600</u>	<u>1800</u>	<u>Matthew Bahman-Wilson</u>	
Sunday					
Employee Name: <u>GLADES LAKE F.</u>				SS#: <u>3336</u>	
Day	Date	Time In	Time Out	Signature	
Monday					
Monday					
Tuesday					
Wednesday	<u>4-25-18</u>	<u>2406</u>	<u>0606</u>	<u>Glades Lake F.</u>	
Thursday	<u>4-26-18</u>	<u>1200</u>	<u>0100</u>	<u>Glades Lake F.</u>	
Friday	<u>4-27-18</u>	<u>1800</u>	<u>0600</u>	<u>Glades Lake F.</u>	
Saturday	<u>4-28-18</u>	<u>1800</u>	<u>0600</u>	<u>Glades Lake F.</u>	
Sunday					
Employee Name: _____				SS#: _____	
Day	Date	Time In	Time Out	Signature	
Monday					
Monday					
Tuesday					
Wednesday					
Thursday					
Friday					
Saturday					
Sunday					
Employee Name: _____				SS#: _____	
Day	Date	Time In	Time Out	Signature	
Monday					
Monday					
Tuesday					
Wednesday					
Thursday					
Friday					
Saturday					
Sunday					

the actual shift starting time, unless you are late in assuming duties or were specifically requested by the Supervisor to start earlier, in which case the late starting time or requested earlier starting time will be shown. The "Time-Out" column will show the scheduled shift ending time, unless permission is received from the Supervisor to leave earlier, or requested by the Supervisor to work later. Actual ending time will be shown also when relieved late by your replacement or when overtime is necessary for emergency reasons and prior authority could

012 - Patient Entry



8/25/2018 12:26:43:679 PM





EXHIBIT B

TRISTAR - HENDERSONVILLE MEDICAL CENTER

SECURITY DEPARTMENT - GENERAL INCIDENT REPORT

OFFICER: <i>S. Nance</i>	DATE: <i>4/25/2018</i>	CAMPUS: <i>TRISTAR PORTLAND</i>			
REPORT NUMBER:	LAW ENFORCEMENT AGENCY REPORT NUMBER:				
NATURE OF REPORT: <i>G45 Employee Misconduct</i>					
VICTIM #1		UNK: N/A:			
NAME:	CONTACT #:	DATE OF BIRTH:			
STREET ADDRESS:		CITY/STATE:			
RELATIONSHIP TO HMC:	DL#/STATE:				
TREATED IN OUR FACILITY FOR THIS INJURY?	HOUSE SUPERVISOR NOTIFIED?				
IF TRANSPORTED TO ANOTHER FACILITY, WHERE?					
DESCRIPTION OF INJURY:					
SUSPECT #1		UNK: N/A:			
NAME: <i>Matthew Bohman-Wilson</i>	CONTACT #: <i>615-498-3538</i>	DATE OF BIRTH:			
STREET ADDRESS:		CITY/STATE:			
RELATIONSHIP TO HMC: <i>G45 Security officer</i>	DL#/STATE:				
IDENTIFIERS (RACE, SEX, HEIGHT, WEIGHT, HAIR COLOR, SCARS, TATTOOS):					
WITNESS		UNK: N/A:			
NAME: <i>Shawn Nance</i>	CONTACT #: <i>615-388-9605</i>	DATE OF BIRTH:			
STREET ADDRESS: <i>813 Branttown Cir</i>		CITY/STATE: <i>Lafayette, TN 37083</i>			
RELATIONSHIP TO HMC: <i>G45 Security officer</i>	DL#/STATE:				
VEHICLE #1	UNK: N/A:	VEHICLE #2	UNK: N/A:		
MAKE:	MODEL:	YEAR:	MAKE:	MODEL:	YEAR:
COLOR:	VIN:	COLOR:	VIN:	COLOR:	VIN:
OFFICER SIGNATURE: <i>[Signature]</i>			REPORT DATE: <i>4/25/2018</i>		
DISTINGUISHING OFFICER:			EVENT DATE: <i>4/25/2018</i>		
REVIEWING SUPERVISOR:			PAGE- 1 OF		

On 4/25, I Ofc. Shawn Nance worked the 0600-1200 shift at the TriStar Portland facility. At the end of my shift I was relieved by Ofc. Matt Bahrman-Wilson. Ofc. Wilson is habitually late and has established a pattern of tardiness and showing up failing to meet company standards. Per G4S policy on attendance (page 33 G4S handbook) "punctuality and attendance" employees are required to be prompt and punctual, meaning arrive on time. On this day, 4/25/2018, ofc. Wilson was late again for duty, he can be seen on recorded security camera speeding down Redbud Ln, which leads to the hospital ER entrance. Ofc. Wilson did not park in the parking lot, instead he pulled his truck under the canopy that leads to the emergency room entrance for incoming patients. Ofc. Wilson can be seen on recorded video, exiting his truck at 12:02:01 and leaving it blocking the patient access to the ER. Ofc. Wilson entered the ER doors at 12:02:14 and left his truck blocking the ER patient access doors. At 12:15:20 recorded video shows me leaving the building. I stayed later than my scheduled shift because Ofc. Wilson was not ready for duty when he arrived. His shirt and uniform wasn't tucked in neatly and he appeared to not have shaved for a long time. Per G4S policy (page 32 G4S handbook) officers must be neat and clean while on duty. Facial hair is not permitted per policy, and Ofc. Wilson does not appear to have shaved in at least a few months. His appearance clearly does not meet G4S minimum standards. After reviewing recorded security footage, Ofc. Wilson left his truck under the emergency canopy from 12:02:01 until 12:27:03, partially blocking patient access to the emergency room. Upon further review of the recorded security footage, Ofc. Wilson entered his truck at 12:27:03 and drove off the property for reasons unknown, and then returned to park his truck in the appropriate parking lot adjacent to the ER. I have reported Ofc. Wilson's tardiness and appearance issues to Chris Clark, however it continues to be a problem, therefore I have decided to prepare this report and send it up the chain of command for review. I have high professional standards for myself and the people I work with. I can recall during my G4S training the word integrity was used frequently, which brings me to my final and perhaps most critical issue. I was asked by Brian Roll to fax copies of the time cards to him for processing. During this process I observed that Ofc. Wilson had falsified his time cards to show that he was on time when in fact he was not. I took the time during my shift to go back and look at recorded surveillance footage from April 25th, 26th, 27th, and 28th. I was not surprised to see that Ofc. Wilson was late for duty on each of these days. I also observed while looking at recorded security footage that Ofc. Wilson was barely noticeable conducting patrols while on duty. I decided to take a look at the daily reports filed by Ofc. Wilson and compare them to the recorded security footage. I became abundantly clear that Ofc. Wilson has been falsifying his daily activities, for example while looking at recorded security footage, I compared Ofc. Wilson's daily report with the recorded security footage. According to his log on 4/27/18 from 0800 to 1000hrs he conducted an "Exterior hospital patrol. MOB walkthrough and check, conducting a walkthrough of the hospital". I was unable to find any video evidence to support his claims that this patrol was done. This confirms the reports from staff members to me, that state they hardly see Ofc. Wilson. It's clear Ofc. Wilson has been falsifying his reports, and time cards to avoid disciplinary action, which is reported as grounds for immediate termination on pages 38-39 of the G4S handbook. I can't simply allow this behavior to continue, clearly my conversation with Chris Clark was not effective, therefore I am preparing this report and submitting it up the chain of command.

Shawn M. Nance



4/25/2018

EXHIBIT C

TRISTAR - HENDERSONVILLE MEDICAL CENTER

SECURITY DEPARTMENT - OFFICER'S SHIFT REPORT

Officer: S. Nance

Date: 4.22.2018

DAILY NARRATIVE

Today is the first day I have prepared a written report because I have not received any instructions on what to fill out until today. Security at this location has been neglected for some time, there are several issues that need to be addressed. Access control is an issue here. Vendors and contractors come and go without signing in or out with security. They are given "contractor badges" which give them access to the entire facility. Several doors do not lock securely, I will address these specifically in a separate report. I am unsure who the supervisor is, the communication among G4S employees is terrible. The communications situation at this facility is a mess. There are 2-way radios and 3-cell phones. All have different numbers and frequencies. Some of the 2-way radios don't function or have no charger.

I have addressed this issue by contacting Kenny @ nashville communications and Bill Hoolihan @ Hendersonville. Mr. Hoolihan approved the request I have made to consolidate communication on the security radio. By having one channel that everyone can use to contact security, the use of the 2-way radio can become more commonplace. I have begun to train employees how to properly operate the 2-way radios and have implemented random hourly security checks with each department to get them comfortable using them in preparation for an emergency. The security cameras don't function properly and security personnel at this location don't know how to operate them. I will be persistent in my requests to have the cameras fixed ASAP, this presents more than a security risk, it poses a liability to HCA and G4S. I also noticed some needles, a scalpel and what appeared to be a vial of injectable medicine laying on the ground under a sink. I have notified Chris Clark, not sure who to tell, there's no post orders or contact list.

BUILDING A/B/C NOTES

ADDITIONAL DOCUMENT(S) ATTACHED:

INCIDENT REPORT NUMBER(S):

PAGE: 2 OF

SIGNATURE:

S. Nance

REVIEWED BY:

EXHIBIT D







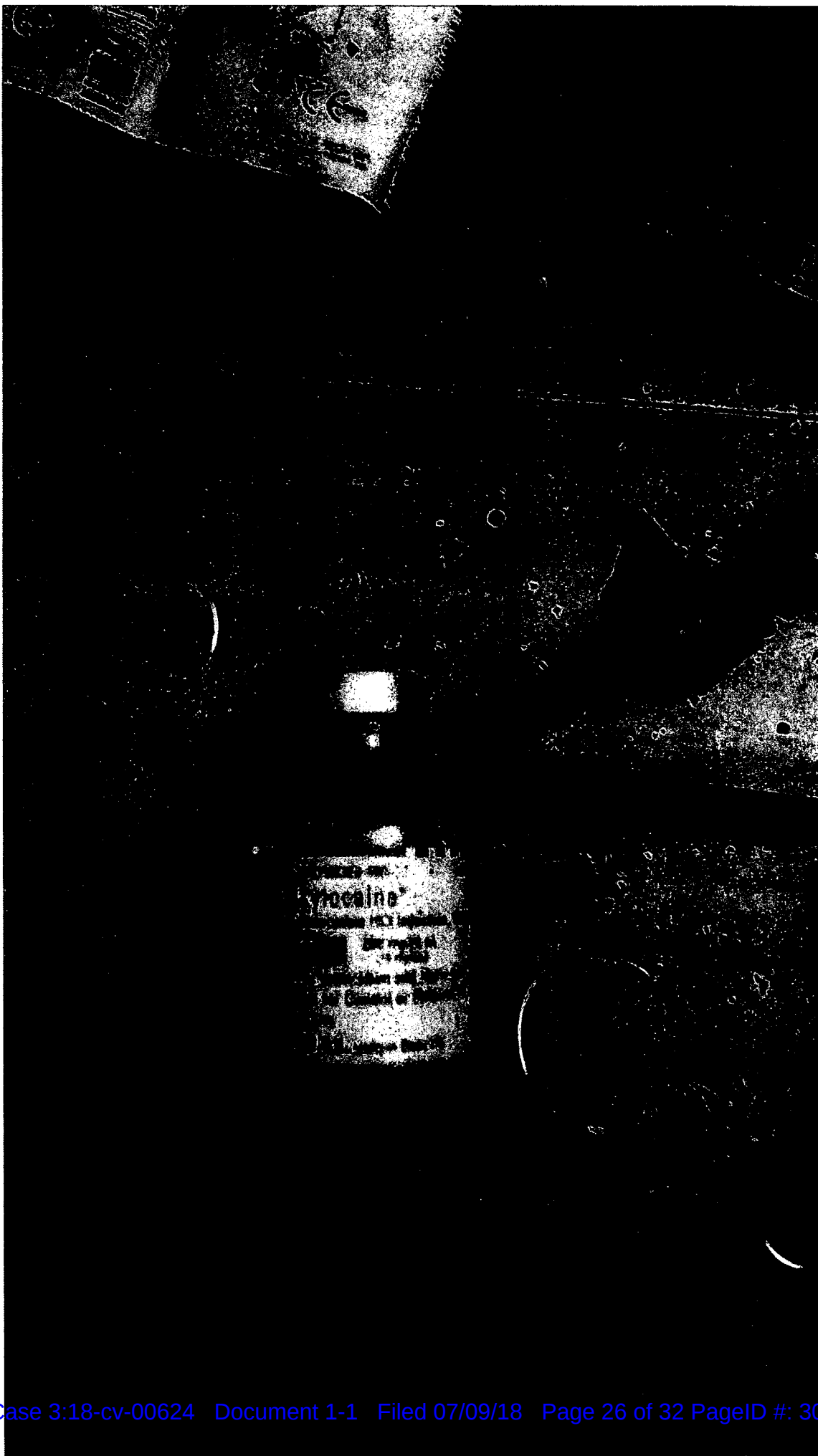


EXHIBIT E

all speak very highly of you there

Received from Chris Clark on Fri Apr 27, 2018 02:55 PM

Message : Curtis at +1 (810) 931-2779

Received from Chris Clark on Fri Apr 27, 2018 02:55 PM

Message : Ashland immediately tonight he will pay you extra please call Chris

Received from Chris Clark on Fri Apr 27, 2018 02:55 PM

Message : Shawn Chris was wondering if you would be able to relieve the officer at

Received from Chris Clark on Fri Apr 27, 2018 02:49 PM

Message : I'm not sure but I guess never mind he got it covered

Sent to Chris Clark on Fri Apr 27, 2018 02:29 PM

Message : where is that located

Received from Chris Clark on Fri Apr 27, 2018 02:26 PM

Message : also get paid and additional 4 hours free added to your pay. So you will be paid 16 hours for the 12 you work tomorrow.

Received from Chris Clark on Fri Apr 27, 2018 02:26 PM

Message : This is Chris from Hendersonville medical. Chris was calling me and was wondering if you could help out at Ashland City tomorrow from 0600-1800 and you will

Received from Chris Clark on Wed Apr 25, 2018 12:23 PM

Message : Thanks

Sent to Chris Clark on Wed Apr 25, 2018 12:22 PM

Message : This is Shawn at Portland. Mr. Matt said you need my number this is it. My email is Odleoff@msn.com

Sent to Jon Knowles on Wed Apr 25, 2018 08:46 AM

Message : Hey Jon Shawn in Portland. Missed you yesterday. Give me a call when you have a chance. Thx

Sent to Jon Knowles on Tue Apr 24, 2018 10:18 AM

Message : had 4 psychs at once was busy when you called. It's calmed down now whenever you get a chance thanks

* Received by: 7734164702 on Fri Apr 27, 2018 08:03 PM

Message : I just wish I could have Sunday off for Church. That's all.

Sent to Chris Clark on Fri Apr 27, 2018 07:30 PM

Message :

Received from Chris Clark on Fri Apr 27, 2018 07:29 PM

Message : Bill

Hoolihan my old boss

Sent to Chris Clark on Fri Apr 27, 2018 07:29 PM

Message : Bill who

* Received by: Chris Clark on Fri Apr 27, 2018 07:28 PM

Message : I need everyone to please voice your opinion to Bill in an email if all possible. Be nice but please voice .

* Received by: Chris Clark on Fri Apr 27, 2018 07:22 PM

Message : Well we need to voice your all's feelings please to Bill

* Received by: 6154983538 on Fri Apr 27, 2018 07:20 PM

Message : Well I was happy with mine also.

* Received by: 7734164702 on Fri Apr 27, 2018 07:18 PM

Message : I was happy with my shift

Received from Chris Clark on Fri Apr 27, 2018 07:18 PM

Message : Yes sir

Sent to Chris Clark on Fri Apr 27, 2018 07:16 PM

Message : Ok so stays the way it is and will revisit on may 14th?

* Received by: Chris Clark on Fri Apr 27, 2018 07:13 PM

Message : Okay I know we were suppose to go to 8 starting on the 30th. However Bill and Mark was not happy how the schedule was written and feels you all are not liking how it is written and there maybe a law suit . So we will be sticking to the 12 hr shift like April's schedule until the 14th of May so we can find a 8hr shift that everyone can be happy with. Only change is Tracey you will be splitting the 8hr shift on Weds to get your 40hrs. I am so sorry about this everyone this is not my doing. This is coming from Bill and Mark and G4s. G4s and I will have three different schedules written for Bill and Mark to decide on. However I am definitely going to make sure each end

to change the computer call in for you all. Very difficult so they said at G4

* Received by: 7734164702 on Fri Apr 27, 2018 08:20 PM

Message : Just an idea.

* Received by: 6154983538 on Fri Apr 27, 2018 08:19 PM

Message : Rotating weekends don't work for me. My wife works EMS which has a rotating schedule and eventually there will be weeks were I won't get to see her.

* Received by: 7734164702 on Fri Apr 27, 2018 08:18 PM

Message : Why not rotating weekends to make everyone happy? Just an idea.

* Received by: 6154999902 on Fri Apr 27, 2018 08:17 PM

Message : I agree with Matt. It is frustrating. It's impossible to plan your days off when you don't know when they will be.

* Received by: 6159721965 on Fri Apr 27, 2018 08:16 PM

Message : I would love to have Sundays off as well or at least one weekend day off but working every weekend will not work!

* Received by: 7734164702 on Fri Apr 27, 2018 08:16 PM

Message : Chris, it wasn't me

* Received by: 7734164702 on Fri Apr 27, 2018 08:15 PM

Message : It wasn't me guys.

* Received by: 6154983538 on Fri Apr 27, 2018 08:14 PM

Message : I was excited to be off for church and the fire dept. Which does it's training Saturday mornings. I guess I'm going to miss the yearly fund raiser which I had already committed to on May 5th because our schedules changed. This is frustrating for those of us who have seniority and have put years of dedication and commitment towards the company.

* Received by: Chris Clark on Fri Apr 27, 2018 08:14 PM

Message : Like I said someone made a big deal about it and now Bill is afraid of a law suit and I'm sure you all know what kind. Yet one person ruined it for everyone.

* Received by: Chris Clark on Fri Apr 27, 2018 08:07 PM

Message : You had days off for Church and just like Stafford had Sat off Larry got off what he wanted so he could do his preaching I mean all needs to understand not everyone can get what they

have any questions and I'll get back to you promptly. The location for the meeting is TBD until we get a room booked.

Thanks,
Christopher Clark

* Received by: Chris Clark on Sat Apr 28, 2018 08:26 AM

Message : I promise I will fix this just hang in there

* Received by: 6154999902 on Sat Apr 28, 2018 08:23 AM

Message : Well since I haven't been able to give an official schedule, I've probably lost out on my second job that I was having to get in order to afford the insurance G4S is providing us.

* Received by: Chris Clark on Fri Apr 27, 2018 08:29 PM

Message : Everyone have a safe weekend either way we will figure this out and vote. You all have a great night and be safe

* Received by: Chris Clark on Fri Apr 27, 2018 08:28 PM

Message : Show me and I'll do it Daniel and if your stating everyone Monday through Friday and then rookies on weekend then your check will come up short then 16 because we will have to have a more body's then what we are contracted to have. Rotating weekends is in the air but it will take only one to shut that down if we do it so everyone needs to stick to there shift and if they can't get it covered then you will have to show up... I'm telling you they don't play on this shift coverage

* Received by: 6154999902 on Fri Apr 27, 2018 08:23 PM

Message : A rotating weekend works best with a 12 he shift. I know form experience at my last job. G4S wants us on 8hrs from my understanding.

* Received by: 6159721965 on Fri Apr 27, 2018 08:22 PM

Message : With respect there is a way to work out a schedule that will work for everyone

* Received by: 6159721965 on Fri Apr 27, 2018 08:21 PM

Message : I won't get to see my wife either working every weekend . We pass each other in the dark literally. I like the rotating weekends idea

* Received by: Chris Clark on Fri Apr 27, 2018 08:20 PM

Message : Again Mason if you still wish to transfer I will not stop you but anywhere you go you will be last to pick on the schedule .im sorry I swear I'm not trying to be mean, I am just trying to be realistic and honest. On the rotating weekends is an option but it will make it a million times harder



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